



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

March 26, 2012

Ms. Suzanne B. Herron, P.E., CPESC
Director Environmental Division
Tennessee Department of Transportation
505 Deaderick Street, Suite 900
Nashville, TN 37243

SUBJECT: Supplemental Final Environmental Impact Statement for Proposed Kirby Parkway from Macon Road to Walnut Grove Road in Memphis, Shelby County, Tennessee
CEQ Number 20070483

Dear Ms. Herron:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Supplemental Final Environmental Impact Statement (SFEIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The City of Memphis, in conjunction with the Federal Highway Administration (FHWA) and the Tennessee Department of Transportation (TDOT), proposes to construct the 2.5-mile Kirby Parkway from, Walnut Grove Road to the intersection of Whitten and Macon Roads in Memphis, Shelby County, Tennessee.

The SFEIS has been prepared to address changes that have occurred since the approval of both the Record of Decision (November 1991) and Environmental Reevaluation (March 2001) for the original Kirby Parkway project. In 2005, a team (Shelby Farms Advisory Team) consisting of the general public, local officials, and state and federal agencies participated in the study of Kirby Parkway. In 2006, as part of a comprehensive context sensitive solutions (CSS) process, this team developed and came to a consensus on the Parkway alternatives. The purpose of the Draft SFEIS is to evaluate three new alternative alignments (L, M, and Q) utilizing a combination of existing and new location between Macon Road and Walnut Grove Road. The proposed new roadway design includes the addition of a new interchange, access control, intersection modifications and a design change from six lanes to four lanes split by a landscaped median. The no-build alternative was also considered. Alternative Q is identified as the preferred alternative.


Based on our review of the SFEIS, EPA's has remaining environmental concerns that were first addressed in the SDEIS, associated with water resource impacts to the Wolf River. EPA concerns are related to potential Water Quality Impacts associated with construction and future operation of the proposed project. Both the SDEIS and the SFEIS state that the project alternatives would impact the Wolf River and all of the intermittent streams in the project area. It states, "There will likely be short-term impacts to stream fisheries along the Wolf River due to

reduced water quality from physical disturbances, such as rechanneling, bridge pier placement, or other in-stream construction operations.” The Wolf River has been identified by the State of Tennessee in 2006 as not meeting designated uses from loss of biological integrity due to siltation. EPA recommends strict adherence to the erosion control and construction best management practices (BMPs) to protect water quality and aquatic habitat. BMPs located along the banks of the Wolf River may be required and maintained long after the construction phase of this project is completed to ensure that eroded materials are not deposited in the stream.

EPA recommends that the Record of Decision (ROD) address the issues of BMPs and post-construction monitoring to ensure that Water Quality and Biological integrity is maintained at acceptable levels along the Wolf River and all other streams within the project boundaries.

We appreciate the opportunity to review the proposed action. For additional information you may contact Larry Long of my staff at (404) 562-9460.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management